

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**JEFFREY SZORIK**

**Plaintiff,**

**v.**

**SAFEGUARD STORAGE  
PROPERTIES LLC**

**Defendant.**

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**CASE NO. 08cv4874**

**JUDGE ZAGEL**

**MAGISTRATE JUDGE COLE**

**DEFENDANT’S UNOPPOSED MOTION FOR REMAND TO STATE COURT**

Defendant Safeguard Storage Properties LLC (“Defendant”) hereby moves to withdraw its Notice of Removal and to remand the captioned case to the Circuit Court of Cook County, Illinois and in support thereof states as follows:

(1) Plaintiff Jeffrey Szorik filed his Complaint against Defendant in the Circuit Court of Cook County, Illinois, County Department, Law Division on July 15, 2008 and served the Complaint on Defendant on July 29, 2008.

(2) Defendant filed its Notice of Removal on August 26, 2008 and the matter was removed from the Circuit Court of Cook County, Illinois County Department, Law Division to this Court.

(3) Subsequent to the filing of the Notice of Removal, counsel for Plaintiff and counsel for Defendant have conferred and agree that remand to state court is appropriate in this case. Plaintiff specifically consents to the remand to the Circuit Court of Cook County, Illinois.

WHEREFORE, Defendant respectfully requests that the above-captioned case currently pending in this Court be remanded to the Circuit Court of Cook County, Illinois, County Department, Law Division.

Respectfully submitted,

SAFEGUARD STORAGE PROPERTIES LLC

By: /s/ Kevin D. Kelly  
One of Its Attorneys

Kevin D. Kelly  
LOCKE LORD BISSELL & LIDDELL LLP  
111 South Wacker Drive  
Chicago, Illinois 60606-4410  
Tel: (312) 443-0700  
Fax: (312) 443-0336

**CERTIFICATE OF SERVICE**

I hereby certify that on August 27, 2008, I electronically filed the foregoing  
UNOPPOSED MOTION FOR REMAND TO STATE COURT with the Clerk of the Court using  
the CM/ECF system which sent notification of such filing to the following:

Sean Brendan Crotty

scrotty@colemanlawfirm.com

/s/Kevin D. Kelly